

EXHIBIT 2

EXHIBIT A

Rob Ellison
Consulting for

*Dear Mr. Mohamed Al-Sharif,
Kindly follow up in full coordination
with Mr. Ibrahim Fayez, member of
the Board of Directors.*

Dubai Islamic Bank pjsc,
P.O. Box 1080,
Airport Road,
Dubai, U.A.E.



To: Executive Committee
Date: 15th September, 1999.
Subject: **New York Times**
United States State Department

In July there were news stories about DIB assisting Ossama Bin Ladin by money laundering. There were no facts to back up the story, but the day after the story appeared the US State Department briefing covered the topic and appeared to confirm the story.

I attach copies of the New York Times story and of the transcript of the briefing.

REDACTED

REDACTED

Our Miami lawyers have recommended that they should write to New York Times on DIB's behalf in the form of the attached draft letter, indicating that the story has no basis in fact and push them to print a retraction.

If the New York Times does not have evidence (which seems most unlikely), but has relied on innuendo and rumour, then DIB could consider taking legal action.

The matter does have another and more serious side; it would be possible for the authorities in the USA to freeze DIB's assets if it was considered that there had been assistance to a well-known terrorist.

Also, the reports have raised questions in the minds of DIB's advisers and friends in the USA; it would be best to lay them to rest.

I would like your approval that the attached letter be sent. Whether the matter is taken further would depend on the response made by the New York Times.



A. R. Ellison

Mr. Rob Ellison

*I have discussed this matter with
Mr. Ibrahim Fayez & okayed
the action*

Mohamed Al-Sharif

15/11/99

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03 MDL 1570 (GBD), United States District Court for the Southern District of New York

DIB_003174t

DRAFT

Mr. Arthur Ochs Sulzberger, Jr.
Publisher
The New York Times
229 West 43rd street
New York, NY 10035

Mr. James Risen
c/o The New York Times
229 West 43rd street
New York, NY 10035

Mr. Benjamin Weiser
c/o The New York Times
229 West 43rd street
New York, NY 10035

Re: False Statements About Dubai Islamic Bank in July 8, 1999 Article re:
Osama Bin Laden

Dear Mr. Sulzberger, Mr. Risen, and Mr. Weiser:

We represent Dubai Islamic Bank ("DIB") of the United Arab Emirates, one of the subjects of the article authored by Mr. Risen and Mr. Weiser entitled "U.S. Officials Say Aid for Terrorists Came Through Two Persian Gulf Nations" which appeared in the July 8, 1999 edition of *The New York Times*. Our client intends to file suit for defamation against *The New York Times* for publishing knowingly false articles about DIB in this article and/or placing DIB in a false light. This letter constitutes your notice pursuant to Section 770.01 of the Florida Statutes. Set forth below are the false and defamatory statements of fact in the articles upon which DIB is considering filing suit.

DIB has never dealt directly with Osama Bin Laden, and had no knowledge or reason to believe that anyone acting on Bin Laden's behalf had been laundering his money through DIB. The following statements in the New York Times July 8 article suggest otherwise:

The Central Intelligence Agency has obtained evidence that Mr. Bin Laden has been allowed to funnel money through the Dubai Islamic Bank in Dubai, which the United Arab Emirates Government effectively controls.

The allegations that the Dubai Islamic Bank is dealing with Mr. Bin Laden seem to underscore that this scion of one of Saudi Arabia's wealthiest families retains some support among the elite of the Arab world.

United States intelligence officials said they had evidence that Mr. Bin Laden had a relationship with the bank, which they believed had been arranged with the approval of the officials who control the bank.

A senior United States official who went to the Emirates last week said that officials were "responsive" to American concerns about the Dubai bank's involvement with Mr. Bin Laden. ... The American officials also declined to

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Mr. Arthur Ochs Sulzberger, Jr.
Mr. James Risen
Mr. Benjamin Weiser
July 27, 1999
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say how much money they believed that Mr. Bin Laden had funneled through the bank.

Taken as a whole, the article conveys the message that DIB knowingly assisted a terrorist in laundering money. This message is utterly and completely false.

Accordingly, we demand that you print a retraction of the portions of the article listed above. This retraction should indicate that DIB did not have any dealings with Bin Laden and that any money he received from DIB indirectly, through a legitimate customer of DIB, was transmitted to him without the knowledge or intent of DIB and not due to any fault of DIB.

We look forward to hearing from you shortly.

Sincerely,

FINE & ASSOCIATES, P.A.

WILLIAM L. RICHEY, P.A.

Alan S. Fine

William L. Richey

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CERTIFICATE OF TRANSLATION

Title of Source Document: DIB_003174 – DIB_003176

Source Language: Arabic

Translated to: English

TRANSLATOR STATEMENT

I, Lucinda Wills, am competent to translate from Arabic into English, and certify under penalty of perjury that the translation of the foregoing document is true and accurate to the best of my abilities.

Translator Qualifications:

20 years translation experience (Arabic-English)

Professional certification in Arabic-English Translation (New York University)

Associate Member of American Translators Association

Signature of Translator:

Lucinda Wills

Date:

March 27, 2019

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